

August 9, 2010

Ms. Sharon Fang, P.E.
Remedial Project Manager (3HS21)
U.S. EPA Region III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

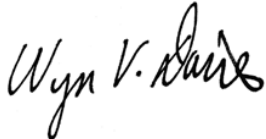
Re: Metal Bank Cottman Avenue NPL Site
Monthly Report due August 10, 2010
Reporting Period: July 1 through July 31, 2010

Dear Ms. Fang:

As provided in Paragraph 31 of the Utility Consent Decree, and on behalf of the Cottman Avenue PRP Group, Malcolm Pirnie as the Supervising Contractor is submitting to USEPA three copies of a written monthly progress report. Copies of the monthly progress reports are attached to this letter.

Please contact the Designated Project Coordinator, Dr. John Dobi (973.430.8036) or me (610.360.4895) if you need additional information regarding this submission.

Very truly yours,
MALCOLM PIRNIE, INC.



Wyn V. Davies, CIH
Senior Associate

Cc: Cottman Avenue PRP Group
Steering and Technical Committees
Joseph Vitale, P.E.
Raymond E. Lees, P.E., CHMM
Dan J. Jordanger, Esquire

Enclosures
3809012

Project Name: Metal Bank NPL Site	For the Month: July 2010	
Project Location: Philadelphia, PA	Report Number: 52	Dated: August 9, 2010

Name: Wyn Davies (Malcolm Pirnie, Inc.)	Title: Project Manager
Telephone No.: (610) 360-4895	Telefax No.: (610) 768-5817

Reporting Period: July 1 through July 31, 2010

(a) Describe the actions which have been taken toward achieving compliance with the Consent Decree during the previous month:

Remedial action monitoring continued throughout the month of July. Activities included the following:

- Performance and completion of the first groundwater O&M Monitoring
- Performed measurements with an oil-water interface probe to determine if any LNAPL is entering the trench and/or sumps (7/7/10)
- Performed an assessment of the vegetative cover (7/7/10)
- Performed an assessment of the invasive plants (7/7/10)
- Performed a post significant rain event inspection on July 14, 2010 due to storms of 7/12 and 7/13
- Maintained soil erosion & sedimentation control aspects
- Inspected Building 7 for epoxy condition (7/7/10)
- Severson completed final project closeout items

(b) Include a summary of all results of sampling and tests and all other data received or generated by Settling Third-Party Defendants or their contractors or agents in the previous month:

Item	Submittal	Date
Aerial Photography for Final Condition	F152s	7/16/10
Revised Drawing for Western Marine Mattress	F139s	7/30/10

(c) Identify all work plans and other deliverables required by the Consent Decree completed and submitted during the previous month:

- EPA to Cottman Ave PRP Group – EPA letter for the conditional approval of the biota QAPP and comments for response by the Group (7/16/10)
- Cottman Ave PRP Group to EPA – EPA provided notice for the commencement of groundwater monitoring and epoxy coating repairs to Building 7 (7/19/10)
- EPA to Cottman Ave PRP Group – EPA concerns relative to the long term eradication plan for invasive plants (7/19/10)
- Cottman Ave PRP Group to EPA – EPA informed by the Group that the long term eradication plan for invasive plants was included in the June 29th correspondence (7/19/10)
- EPA to Cottman Ave PRP Group – EPA request for verification that the long term eradication plan for invasive plants allows for confirmed plant death prior to cutting the


















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<p>weeds down. (7/21/10)</p> <ul style="list-style-type: none"> • Cottman Ave PRP Group to EPA – EPA informed of the verification process for the long term eradication plan for invasive plants confirming plant death prior to cutting the weeds down. (7/21/10) • EPA to Cottman Ave PRP Group – EPA provides an extension for the Biota QAPP response to comments until August 6th (7/21/10) • EPA to Cottman Ave PRP Group – EPA provides coordination details for the O&M groundwater monitoring program to commence on July 26th (7/23/10) • Cottman Ave PRP Group to EPA – EPA informed of further groundwater monitoring program coordination for July 26th and the availability of a boat for EPA sediment sampling (7/23/10) • Cottman Ave PRP Group to EPA – Submittal of the boat registration and captain license for the sediment sampling activities to be performed by EPA (7/26/10) • EPA to Cottman Ave PRP Group – EPA indicates to the Group the intended split sampling strategy for the biota aspects (7/29/10)
<p>(d) Describe all actions, including, but not limited to, data collection and implementation of work plans, which are scheduled for the next month and provide other information relating to the progress of construction, including, but not limited to, critical path diagrams, Gantt charts, and Pert charts:</p>
<ul style="list-style-type: none"> • The Group will develop the response to comments for the conditional approval of the biota QAPP due on August 6th. • The Utility Group will continue monitoring the post construction activities including: <ul style="list-style-type: none"> ○ Initiate the installation of the sheet pile wall monitoring devices ○ Maintain the soil erosion & sedimentation control aspects ○ Monitor the LNAPL Trench Sumps for free product ○ Initiate the epoxy coating repairs to sheet pile wall ○ Continue monitoring of site for HSE compliance
<p>(e) Include information regarding percentage of completion, unresolved delays encountered or anticipated that may affect the future schedule for implementation of the Work, and a description of efforts made to mitigate those delays or anticipated delays:</p>
<ul style="list-style-type: none"> • Commenced the LTM effective 7/1/2010
<p>(f) Include any modifications to the work plans or other schedules that Settling Third-Party Defendants have proposed to EPA or that have been approved by EPA:</p>
<ul style="list-style-type: none"> • none
<p>(g) Describe all activities undertaken in support of the Community Relations Plan during the previous month and those to be undertaken in the next month:</p>

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<ul style="list-style-type: none"> The Group will coordinate with EPA on any community outreach endeavors on an as needed basis through the post construction period. 		

Metal Bank - Post Construction Schedule

ID	Task Name	Duration	Start	Finish	August				September				October
					8/1	8/8	8/15	8/22	8/29	9/5	9/12	9/19	
1	Post Construction Inspections	111 days	Wed 2/3/10	Wed 7/7/10									
14	Comments on LTM	14 days	Mon 5/10/10	Thu 5/27/10									
15	EPA/Cottman PRP Final Inspection	1 day	Thu 4/29/10	Thu 4/29/10									
16	Submittal of Engineer Certification Report	1 day	Fri 5/28/10	Fri 5/28/10									
17	EPA Comments on Groundwater QAPP	5 days	Mon 5/17/10	Fri 5/21/10									
18	LTM Biota QAPP	93 days	Wed 3/31/10	Fri 8/6/10	<div></div>								
19	Commencement of LTM	1142 days	Mon 7/12/10	Tue 11/25/14									
20	Groundwater Monitoring	1114 days	Mon 7/26/10	Thu 10/30/14									
39	Sheet Pile Wall Monitoring	1112 days	Mon 8/23/10	Tue 11/25/14					<div></div>				
92	Complete Action Items from Final Inspection	30 days	Fri 4/30/10	Thu 6/10/10									
93	PRP and EPA Approval of Invasive Species Control Plan	14 days	Wed 7/21/10	Mon 8/9/10	<div></div>								
94	Invasive Species Herbicide Treatment - Milnor St.	2 days	Mon 8/23/10	Tue 8/24/10					<div></div>				
95	Invasive Species (Knot Weed) Treatment along Delaware River Bank	3 days	Wed 8/25/10	Fri 8/27/10					<div></div>				
96	Evaluation of Native Grass Germination	2 days	Wed 6/23/10	Thu 6/24/10									
97	Overseed Drilling of Native grasses (If necessary)	4 days	Thu 8/12/10	Tue 8/17/10	<div></div>								

Project: Metal Bank Post Construction Date: Wed 8/4/10	Task		External Milestone		Manual Summary Rollup	
	Split		Inactive Task		Manual Summary	
	Milestone		Inactive Milestone		Start-only	
	Summary		Inactive Summary		Finish-only	
	Project Summary		Manual Task		Progress	
	External Tasks		Duration-only		Deadline	